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**IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE NORTHERN DISTRICT OF TEXAS
 DALLAS DIVISION**

In re:)	
)	Chapter 11
HIGHLAND CAPITAL MANAGEMENT, L.P., ¹)	
)	Case No. 19-34054-sgj11
Reorganized Debtor.)	
)	
In re: CHARITABLE DAF FUND, L.P., AND)	
CLO HOLDCO LTD.,)	Adv. Pro. No. 21-03067-sgj
Plaintiffs,)	
vs.)	
)	
HIGHLAND CAPITAL MANAGEMENT, L.P.,)	
HIGHLAND HCF ADVISOR, LTD., AND)	
HIGHLAND CLO FUNDING, LTD.)	
Defendants)	

**HIGHLAND CAPITAL MANAGEMENT, L.P.’S
 RESPONSE TO “RENEWED” MOTION TO WITHDRAW THE REFERENCE**

¹ The Reorganized Debtor’s last four digits of its taxpayer identification number are (8357). The headquarters and service address for the Reorganized Debtor is 100 Crescent Court, Suite 1850, Dallas, TX 75201.

Highland Capital Management, L.P., a defendant in the above-captioned adversary proceeding (“Highland”), hereby submits this response (the “Response”) in opposition to the *Renewed Motion to Withdraw the Reference* [D.I. 128] (the “Motion”) filed by plaintiffs The Charitable DAF Fund, L.P. (“DAF”) and CLO Holdco, Ltd. (“CLOH,” and together with DAF, “Plaintiffs”). In support of its Response, Highland states as follows:

RELIEF REQUESTED

1. Through this Response, Highland respectfully requests that the Court deny the Motion in full, because the Motion is nothing more than another attempt by Plaintiffs to forum shop, delay adjudication, and waste judicial and estate resources.

2. Pursuant to Rules 7.1(d) and (h) of the *Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas* (the “Local Rules”), a separate brief (the “Brief”) is being filed contemporaneously with this Response and is incorporated by reference as if fully set forth herein.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Highland respectfully requests that the Court enter an order (i) denying in whole the relief requested in the Motion, and (ii) granting Highland such further and additional relief as the Court deems just and proper.

Dated: December 9, 2022

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